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8 *Attorneys for Defendants*
9 *Nature's Value, Inc., and*
Richard Persaud

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 JANE DOE,

13 Plaintiff,

14 v.

15 NATURE'S VALUE, INC., RICHARD
16 PERSAUD, and DOES 1 THROUGH 20,

17 Defendants.

Case No.: 2:18-cv-370-RFB-(GWF)

STIPULATION AND ~~(PROPOSED)~~
ORDER REGARDING DEPOSITIONS
OF THE PARTIES AND OTHERS, AND
DISPOSITIVE MOTIONS DEADLINE

18 Defendants Nature's Value, Inc. and Richard Persaud ("Defendants"), by and through their
19 counsel of record, Jackson Lewis P.C., and Plaintiff Jane Doe, by and through her counsel of record,
20 Law Offices of Steven J. Parsons, hereby stipulate as follows:

21 1. On October 23, 2018, Deverie Christensen and Joshua Sliker, counsel for
22 Defendants, filed a Motion to Withdraw as Counsel for Defendant Persaud. ECF No. 37.

23 2. On October 24, 2018, the Court issued a minute order staying discovery as to
24 Defendant Persaud until November 23, 2018 to allow him time to obtain new counsel. ECF No. 38.
25 The Court further ordered that it will not rule on the Motion to Withdraw until after the time to
26 oppose has expired.

27 3. Discovery in this case closes on November 5, 2018.

28 4. The parties conducted depositions of witnesses in San Diego, California on the

1 Notices of Defendants, on November 1, 2018 including Plaintiff's current employer, father, and a
2 so-called independent witness. Unfortunately, Plaintiff's therapist failed to appear as had been
3 Noticed for her continued deposition on November 2, 2018 in San Diego.

4 5. The depositions of Mr. Persaud, the person(s) most knowledgeable of Defendant
5 Nature's Value, Inc., and the continued deposition of Plaintiff remain to be completed.

6 6. In a joint effort to continue discovery, but in recognizing the need for Mr. Persaud
7 to obtain new counsel, and due to the pending Motion to Withdraw, the parties agree that the
8 depositions of Plaintiff and Defendant Nature's Value, Inc. should also be stayed until at least
9 November 23, 2018 to allow Mr. Persaud's new counsel to participate.

10 7. Due to the *de facto* limited extension of time to complete the remaining party
11 depositions, the parties also agree to stay the deadline for filing dispositive motions as any such
12 motions would necessarily involve the deposition testimony.

13 8. Absent an extension of the stay or other relief by the Court, the parties will work
14 together to prepare and file a stipulation by November 30, 2018 that establishes a schedule for
15 completing the remaining depositions and filing dispositive motions.

16 9. The parties do not waive any claim, defense, or argument by this stipulation.

17 Dated this 5th day of November, 2018.

18
19 JACKSON LEWIS P.C.

LAW OFFICES OF STEVEN J. PARSONS

20 /s/ Joshua A. Sliker
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23 *Attorneys for Defendants*

Attorney for Plaintiff

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25 **IT IS SO ORDERED.**

26 Dated: 11/06/2018

27 
UNITED STATES MAGISTRATE JUDGE